REMARKS

In the above-mentioned Office Action, all of the pending claims, claims 1-20, were rejected. Claims 1, 2, 6, 8-14, and 18-20 were rejected under Section 103(a) over the combination of *Sanchez Ferreras* and the Applicant's admitted prior art. Claims 3-5, and 15-17 were rejected under Section 103(a) over the combination of *Sanchez Ferreras*, the Applicant's admitted prior art, and *Aerrabotu*. Additionally, objection was made to the specification for identifying item 60 in the specification, but not showing the reference numeral in Figure 2.

In response, the independent claims, claims 1 and 13, have been amended, as set forth herein, in manners believed better to distinguish the invention of the present application over the references cited against the claims. Amendments made to various of the dependent claims are made responsive to amendments made to their respective parent claims.

With respect to claim 1, the recitation of the detector has been amended, now to recite that the detector is adapted to receive values of additional information associated with mobile nodes during their operation to communicate by way of network portions in whose coverage areas that the mobile nodes are positioned. The detector is further recited to be configured to form indications of values of the positional information. Support for the amendments to the recitation of the detector is found in the specification, for instance, on page 9, lines 3-11, and on page 11, lines 24-27.

The recitation of the associator has been amended, now to recite that the associator is configured to associate positioning of each of the mobile nodes with corresponding network portions through which communications are effectuated, thereby to identify roaming relationships between each of the mobile nodes and the corresponding network portions when the mobile nodes are roaming. Support for these amended recitations is found, for instance, on page 11, line 28 – page 12, line 3, and page 12, line 32 – page 13, line 1.

The recitation of the storage element has also been amended, now to recite that the roaming network table indicates the roaming relationships. Support for these amended recitations are found, for instance, on page 12, lines 1-3.

Method claim 13 has been analogously amended, and support for the recitations of this claim is similarly found in the noted portions of the specification.

The Applicant respectfully traverses the Examiner's reliance upon *Sanchez Ferreras* for showing the detector and associator, as now recited, and the storage element, also as now recited.

With respect to the Examiner's reliance upon the processor 4 for providing the functions of the detector, paragraph 25 states that the processor 4 continuously reads information exchanged between gateways 2 and HLR 5 of a mobile terminal's network. However, neither this section of the reference, nor others, disclose that the processor detects, or forms, indications of values of positional information associated with the mobile nodes. Paragraph 25, in fact, indicates that only MAP protocol parameters are selected by the processor.

With respect to the Examiner's reliance upon the processor 4 and analyzer 6 for disclosing the associator, review of paragraph 25 merely states that the location analyzer collects and analyzes information in order to detect location changes. As amended, the recitation of the associator in claim 1 is recited to associate positioning of mobile nodes with corresponding network portions, thereby to identify roaming relationships. While paragraph 25 states that location changes are detected, there is no disclosure that roaming relationships are identified through association of mobile nodes and corresponding network portions through which communications are effectuated.

And, with respect to the Examiner's reliance upon the database 7 for disclosing the storage element, review of paragraphs 25 and 33 indicate merely that the database stores merely an entry corresponding to a current subscriber location. In fact, paragraphs 35 and 39 indicate upon reception of a cancel location message, the database entry is eliminated. A roaming network table indicating roaming relationships is not provided by the database. To the contrary, only current locations of mobile terminals are stored at the database.

In claim 13, the operations of detecting, associating, and forming a roaming network table are believed to be distinguishable over *Sanchez Ferreras* for the same reasons.

The Examiner does not assert that any prior art admitted by the Applicant to pertain to the detector, associator, or storage element. And, *Aerrabotu* was cited merely for showing an IMSI as a mobile station identity, no combination of these references can be formed together with *Sanchez Ferreras* to create the invention, as now recited in claims 1 and 13.

The remaining dependent claims include all the limitations of their respective parent claims. These claims, therefore, are believed to be distinguishable over any combination of the prior art for the same reasons as those given with respect to their parent claims.

Specific additional note is made of the recitations of claims 9-11 and 18-20. There additionally is no disclosure in the cited prior art of a roaming network table including an indication of a time at which values are stored nor of deletion of values stored at the roaming network table for longer than a selected time period. These dependent claims are believed to be distinguishable over the prior art also for these additional reasons.

The amendment to the paragraph on page 12, lines 18-28, is believed to overcome the Examiner's objection to Figure 2.

In light of the foregoing, independent claims 1 and 13, as now-amended, and the remaining ones of the dependent claims dependent thereon, are believed to be in condition for allowance. Accordingly, reexamination and reconsideration for allowance of these claims is respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

Dated: 27Sep05

Robert H. Kelly
Reg. No. 33,922

SCHEEF & STONE, L.L.P.
5956 Sherry Lane, Suite 1400
Dallas, Texas 75225
Telephone: (214) 706-4201
Fax: (214) 706-4242
robert.kelly@scheefandstone.com